

Hearing Date and Time: December 6, 2011 at 10:00 a.m. (Prevailing Eastern Time)  
Objection Date and Time: November 4, 2011 at 4:00 p.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	)	
	)	Case No. 08-13555 (JMP)
Debtors.	)	(Jointly Administered)
	)	

**LIMITED OBJECTION AND JOINDER OF BNY MELLON CORPORATE TRUSTEE  
SERVICES LIMITED IN LIMITED OBJECTION OF LIQUIDATORS OF LEHMAN  
BROTHERS AUSTRALIA LIMITED TO THIRD AMENDED JOINT CHAPTER 11  
PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS**

BNY Mellon Corporate Trustee Services Limited (“BNYM”), by its undersigned counsel,  
hereby files its Limited Objection and Joinder of BNY Mellon Corporate Trustee Services  
Limited in Limited Objection of Liquidators of Lehman Brothers Australia Limited to Third  
Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors,  
and states as follows:

1. BNYM is successor trustee under a certain Principal Trust Deed, dated 10  
October 2002, between Dante Finance Public Limited Company and J.P. Morgan Corporate  
Trustee Services Limited (as amended and restated, the “Principal Trust Deed”) and certain  
Supplemental Trust Deeds entered into in accordance with the Principal Trust Deed (collectively,

the “Trust Deed”), including those referenced specifically in the LBA Limited Objection (as defined below).<sup>1</sup>

2. On or about November 4, 2011, the Liquidators of Lehman Brothers Australia Limited (“LBA”), filed their Limited Objection to the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “LBA Limited Objection”) [Docket No. 21602] in which LBA objected to confirmation of the Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”) insofar as it provides for the assumption or assumption and assignment of certain contracts between Lehman Brothers Special Financing Inc. and (i) Saphir Finance Public Limited Co., (ii) Beryl Finance Limited, and (iii) Zircon Finance Limited.

3. At the direction of LBA given in accordance with the Trust Deed, the Trustee joins in the LBA Limited Objection and objects to confirmation of the Plan for the reasons set forth in the LBA Limited Objection.

Dated: November 4, 2011  
New York, New York

Respectfully submitted,

REED SMITH LLP

By: /s/ Michael J. Venditto  
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<sup>1</sup> BNYM incorporates by reference the definitions used in the LBA Limited Objection.